

STATE OF SOUTH CAROLINA

BEFORE THE  
PUBLIC SERVICE COMMISSION

In the matter of Petition for Approval of Nextel South  
Corp.'s Adoption of the Interconnection Agreement  
Between Sprint Communications Company L.P.,  
Sprint Spectrum L.P. d/b/a Sprint PCS And  
BellSouth Telecommunications, Inc. d/b/a AT&T  
South Carolina d/b/a AT&T Southeast

COVER SHEET

DOCKET  
NUMBER: 2007 - 255 - C

And

In the matter of Petition for Approval of NPCR, Inc.  
d/b/a Nextel Partners' Adoption of the  
Interconnection Agreement Between Sprint  
Communications Company L.P., Sprint Spectrum  
L.P. d/b/a Sprint PCS And BellSouth  
Telecommunications, Inc. d/b/a AT&T South  
Carolina d/b/a AT&T Southeast

DOCKET  
NUMBER: 2007 - 256 - C

(Please type or print)

Submitted by: J. Jeffrey Pascoe

SC Bar Number: 71104

Address: 550 So. Main Street, Suite 400  
Greenville, SC 29601

Telephone: 864.255.5422

Fax: 864.239.5855

Other:

Email: jpascoe@wcsr.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☒ Other: MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation

☐ Transportation

☐ Water

☐ Water/Sewer

☐ Administrative Matter

☐ Other:

☐ Discovery

☐ Exhibit

☐ Expedited Consideration

☐ Interconnection Agreement

☐ Interconnection Amendment

☐ Late-Filed Exhibit

☐ Prefiled Testimony

☐ Promotion

☐ Proposed Order

☐ Protest

☐ Publisher's Affidavit

☐ Report

☐ Subpoena

☐ Tariff

☐ Other: Rebuttal  
Testimony

**BEFORE THE**  
**PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

<b>In the matter of:</b>	)	
	)	
<b>Petition for Approval of Nextel South Corp.'s Adoption of the Interconnection Agreement Between Sprint Communications Company L.P., Sprint Spectrum L.P. d/b/a Sprint PCS And BellSouth Telecommunications, Inc. d/b/a AT&amp;T South Carolina d/b/a AT&amp;T Southeast</b>	)	<b>Docket No. 2007-255-C</b>

<b>In the matter of:</b>	)	
	)	
<b>Petition for Approval of NPCR, Inc. d/b/a Nextel Partners' Adoption of the Interconnection Agreement Between Sprint Communications Company L.P., Sprint Spectrum L.P. d/b/a Sprint PCS And BellSouth Telecommunications, Inc. d/b/a AT&amp;T South Carolina d/b/a AT&amp;T Southeast</b>	)	<b>Docket No. 2007-256-C</b>

**MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL**

NOW COMES, J. Jeffrey Pascoe of Womble Carlyle Sandridge & Rice, PLLC ("WCSR"), counsel for NPCR, Inc. d/b/a Nextel Partners and Nextel South Corp. ("Petitioners"), and moves the South Carolina Public Service Commission (the "Commission") for permission for Mr. Pascoe and WCSR to withdraw as counsel of record, and to substitute John J. Pringle, Jr., of Ellis, Lawhorne & Sims, P.A. ("Ellis Lawhorne") as counsel of record for Petitioners in these consolidated petitions (the "Petitions"). In support of this Motion, the undersigned respectfully shows the Commission the following:

1. On July 23, 2007, Petitioners commenced the Petitions against BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina d/b/a AT&T Southeast ("AT&T").

2. Mr. Pascoe signed both Petitions as counsel of record for Petitioners.
3. Because the Petitions are still in the early stages, and because the PSC will not hear the Petitions until January 31, 2008, the withdrawal of Mr. Pascoe and WCSR can be accomplished without material adverse effect on Petitioners.
4. No scheduled hearing will be delayed by the granting of this motion to withdraw.
5. Petitioners are aware of and consent to this motion to withdraw and substitute counsel.
6. Upon the withdrawal of Mr. Pascoe and WCSR, Mr. Pringle and Ellis Lawhorne will serve as counsel of record for Petitioners in the Petitions. Mr. Pringle and Ellis Lawhorne hereby give notice of appearance on behalf of Petitioners in the Petitions.

WHEREFORE, J. Jeffrey Pascoe and the law firm of Womble Carlyle Sandridge & Rice, PLLC respectfully request permission to withdraw as counsel for the Petitioners in these proceedings, and that John J. Pringle, Jr. and the law firm of Ellis, Lawhorne & Sims, P.A. be permitted to appear on behalf of Petitioners in these Petitions.

Respectfully submitted this 6<sup>th</sup> day of December, 2007.

/s/ J. Jeffrey Pascoe  
J. Jeffrey Pascoe  
Womble Carlyle Sandridge & Rice, PLLC  
550 South Main Street  
Suite 400  
Greenville, SC 29601  
(864) 255-5400  
Fax: (864) 255-5440  
[jpascoe@wcsr.com](mailto:jpascoe@wcsr.com)

/s/ John J. Pringle, Jr.  
John J. Pringle, Jr.  
Ellis, Lawhorne & Sims, P.A.

1501 Main Street, 5th Floor  
Columbia, SC 29201  
(803) 343-1270  
(803) 799-8479  
(803) 479-5764  
[jpringle@ellislawhorne.com](mailto:jpringle@ellislawhorne.com)

**BEFORE THE**

**PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**In the matter of:** )

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d/b/a AT&T South Carolina d/b/a )  
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**Docket No. 2007-255-C**

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And BellSouth Telecommunications, )  
Inc. d/b/a AT&T South Carolina d/b/a )  
AT&T Southeast )


**Docket No. 2007-256-C**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 6, 2007, she served a copy of the attached **Motion to Withdraw and to Substitute Counsel** by first-class mail, proper postage affixed addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es):

Patrick W. Turner, Esq.  
General Counsel-South Carolina  
BellSouth Telecommunications  
Legal Department  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

Nanette S. Edwards  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, SC 29211



Julie A. Curll, Legal Assistant  
Womble Carlyle Sandridge & Rice, PLLC  
PO Box 10208  
Greenville, SC 29603-0208

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